



Cullen and Dykman LLP  
The Omni Building, 2<sup>nd</sup> Floor  
333 Earle Ovington Blvd.  
Uniondale, NY 11553

**Ryan Soebke**

Partner  
Direct Dial: (516) 357-3784  
Facsimile: (516) 357-3792  
rsoebke@cullenllp.com

January 10, 2025

**VIA ECF**

Hon. Edgardo Ramos  
United States District Judge Thurgood Marshall  
United States Courthouse  
40 Foley Square, Courtroom 619  
New York, NY 10007

**Re: Esther Solomon v Fordham University (Case No. 1:18-cv-04615)**

Dear Judge Ramos:

This firm represents Fordham University (“Fordham” or “Defendant”) in the above-referenced matter. We write regarding the status of discovery in this matter. On September 20, 2024, Your Honor granted Fordham’s request to extend the end date for discovery until February 14, 2025. Docket No. 163. Fordham’s request included several interim discovery deadlines. Since that time, Fordham has made additional productions of documents to *pro se* Plaintiff Esther Solomon (“Plaintiff”).

In addition, Fordham has sought to work with Plaintiff to schedule her deposition. On October 28, 2024, we provided Plaintiff with a Notice of Deposition to hold her deposition November 20, 2024. Plaintiff responded by informing us “that date is not possible” and that she was “trying to secure attorney representation before all depositions.” On November 11, 2024, we sent a follow-up email to Plaintiff inquiring as to whether she had retained an attorney. We also asked for her availability to be deposed in early December. Plaintiff did not respond to this email and instead, on November 18, 2024, filed a petition for a writ of mandamus with the Second Circuit.

We again reached out to Plaintiff on November 25, 2024 in an attempt to schedule her deposition. Plaintiff responded on November 27, 2024 informing us that she would not appear for her deposition as it is her opinion that “[t]he pending Writ of Mandamus should take precedence and we should wait for its discovery rulings.” On December 10, 2024, we responded to Plaintiff and informed her that it was Fordham’s position that her filing of a petition for a writ of mandamus did not stay discovery in this action and that the parties should move forward with discovery while Plaintiff’s petition is pending. We asked Plaintiff for a meet and confer call to discuss these discovery issues. Plaintiff responded on December 13, 2024 stating that “[it] does not appear that a meet and confer would have any outcome.”



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Fordham respectfully requests a conference with Plaintiff and the Court pursuant to section 2(A)(i) of Your Honor's Individual Rules of Practice to discuss discovery in this matter in the interest of continuing to move this case forward.

Thank you for your attention to this matter.

Respectfully,

/s/ Ryan Soebke